

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

INDEMNITY INSURANCE CO. OF
NORTH AMERICA,

Plaintiff,
- against -

C.U. TRANSPORT, INC., et al.,

Defendants.

And Five Related Cases

06 Civ. 13439 (RPP)
07 Civ. 00959
07 Civ. 01357
07 Civ. 02562
07 Civ. 03104
07 Civ. 03180

DECLARATION OF PAUL M. KEANE IN
SUPPORT OF THE DISMISSAL MOTION OF
DEFENDANTS, YANG MING MARINE
TRANSPORT CORP. AND YANG MING
(AMERICA CORP.)

PAUL M. KEANE declares that the following statement is true under the penalties of
perjury:

1. I am an attorney at law admitted to practice before this Court and I am a member
of the firm of Cichanowicz Callan Keane Vengrow & Textor, LLP, attorneys for defendants,
YANG MING MARINE TRANSPORT CORP. and YANG MING (AMERICA) CORP., in the
above captioned related actions.

2. The pleadings that are Exhibits C – I of this motion are true and complete copies
of the services copies of those pleadings.

Dated: New York, NY, July 31, 2007

/s/ Paul M. Keane
PAUL M. KEANE [PK-5934]